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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON THE SITE 8A
POLYCHLORINATED BIPHENYL SPILL AREA LETTER MCRD PARRIS ISLAND SC
9/13/2013
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 13, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs Office
Attn: Mr. Tim Harrington
PO Box 5028
Parris Island, SC 29905-9001

Dear Mr. Harrington:

The U.S. Environmental Protection Agency (EPA) has completed its review of the letter from Colonel S. F. Kirkpatrick regarding Site 8A PCB Spill Area (August 21, 2013), a site located on the Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina. In the letter MCRD proposes intrusive activity to be conducted at Site 8A, a site identified in the Federal Facilities Agreement for MCRD.

Based on this letter, EPA understands MCRD needs to conduct intrusive activity at Site 8A in order to re-install chillers and a concrete pad. Before proceeding with the work, MCRD should understand that the investigation of Site 8A has not yet been determined to be complete. EPA has several concerns at the site which may require additional sampling and/or remedial action (eg. soil samples, groundwater samples, soils removal, soils cap, Land Use Controls, etc.) MCRD will need to address whatever action is determined to be necessary regardless of the presence of the new chillers and concrete slab which is described to extend out across and beyond the current bounds of the site investigation.

EPA will be submitting comments on the Site 8A and 8B Site Investigation (SI) Report in the near future. MCRD should keep in mind the concerns expressed by EPA in those comments. In summary they will be:

- PCB spill record indicated PCBs in transformers were released at Site 8A. Also, there was indicated a history of instructions to wash transformers and/or spill sites with Kerosene or Toluene, so PCBs, as well as Kerosene and Toluene, should be considered to be potential site-related contaminants.
- The SI indicates presence of PCB contamination above screening values and or action levels in the zero to 1 foot below ground surface soils;
- Some data issues have been identified with the analysis performed and results reported in the SI;
- The highest hit of PCBs was at the edge of the site boundary. Step out samples will be requested.

- An odor was indicated as coming from the soil core where the groundwater sample was taken. Soils and groundwater samples analyzed for VOCs, SVOCs, GRO and DRO will be requested.
- Because this odor was noticed at depth, it is unclear as to whether a source may be in the soils above or if the source may be from contaminated groundwater entering the site from another area.

MCRD should manage intrusive activity at Site 8A with these concerns in mind. To be comprehensive, MCRD should consider analyzing soils removed from the site for not only PCBs, but also VOCs, SVOCs, GRO, and DRO. Soils should be properly managed and disposed of according to results and corresponding regulatory requirements. Please provide EPA with all analytical results and documentation of the final disposition of the soils once the work is complete. Also please include these records in the Site 8A file.

With all concerns raised by EPA in mind, MCRD should ensure all workers are properly informed of site contaminants and work should proceed in a correspondingly safe manner.

EPA understands MCRD will provide notification if the work to be conducted changes from the work as planned for in the referenced letter style work plan. EPA is available for consultation during this process as appropriate. Please feel free to call with any questions you may have. I can be reached at 404-562-9969.

Sincerely,



Lila Llamas
Senior RPM
Federal Facilities Branch
Superfund Division

Attachment

cc: Dan Owens, NAVFAC
Meredith Amick, SCDHEC
Peggy Churchill, TtNus